**PRE-APPEAL BRIEF REQUEST FOR REVIEW**

Docket Number (Optional)

42P17605

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Signature

Typed or printed
name Tu T. Nguyen

Application No.

10/676,961

Filed

September 30, 2003

First Named Inventor

Florence R. Pon

Art Unit

2815

Examiner

Chris C. Chu

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a Notice of Appeal.

The review is requested for the reason(s) stated on the attached sheet(s).

NOTE: No more than five (5) pages may be provided.

I am the:

- ☐ applicant/inventor.
- ☐ assignee of record of the entire interest.
See 37 CFR 3.71. Statement under of 37 CFR 3.73(b) is enclosed.
(Form PTO/SB/96)
- ☒ Attorney or agent of record.
Registration Number 42,034
- ☐ attorney or agent acting under 37 CFR 1.34.
Registration number if acting under 37 CFR 1.34 _____

Signature

Thinh V. Nguyen

Typed or printed name

(714) 557-3800

Telephone Number

August 07, 2006

Date

NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required. Submit multiple forms if more than one signature is required.

☐ *Total of _____ forms are submitted.

Appl. No. 10/676,961

Pre-Appeal Brief Request for Review



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application No. : 10/676,961
Applicant : Florence R. Pon
Filed : 09/30/2003
TC/A.U. : 2815
Examiner : Chris C. Chu

Confirmation No. 8131

Docket No. : 042390.P17605
Customer No. : 8791

Commissioner for Patents
PO Box 1450
Alexandria VA 22313-1450

PRE-APPEAL BRIEF REQUEST FOR REVIEW

Sir:

In response to the Final Office action dated May 19, 2006, Applicant would like to request a pre-appeal panel review of the application.

Remarks/Arguments begin on page 2 of this paper.

REMARKS/ARGUMENTS

Claims 1-32 are pending in the present application.

This request is in response to the Final Office Action mailed May 19, 2006. In the Final Office Action, the Examiner rejected claims 1, 2, 6,-10, 31 and 32 under 35 U.S.C. §103(a). Applicants respectfully traverse the rejections and contend that the Examiner has not established a prima facie case of indefiniteness and/or anticipation.

Pre-appeal panel review of the application in light of the remarks/arguments made herein is respectfully requested.

There are several clear errors in the Examiner's rejections and arguments.

1) Hung and Khandos, taken alone or in any combination, do not disclose or suggest stacking an upper die having upper top and bottom surfaces and upper first, second, third, and fourth edges on top of a lower die having a lower top surface and lower first, second, third, and fourth edges such that the upper first edge is displaced from the lower first edge by a first distance, the upper first and third edges being opposite to each other, the lower first and third edges being opposite to each other, as recited in claims 1 and 31.

Applicants refer to the response filed on February 27, 2006, page 12. Among other things, Applicants contend that the Examiner failed to identify the staggered arrangement in any one of Hung or Khandos.

2) Hung and Khandos, taken alone or in any combination, do not disclose or suggest the upper bottom surface facing toward the lower top surface such that bond pads on the upper die facing downward while bond pads on the lower die facing upward, as recited in claims 1 and 31.

Applicants refer to the response filed on February 27, 2006, page 12. Among other things, Applicants contend that the Examiner failed to identify the upper bottom surface facing toward the lower top surface such that bond pads on the upper die facing downward while bond pads on the lower die facing upward in any one of Hung or Khandos.

3) Hung and Khandos, taken alone or in any combination, do not disclose or suggest depositing an upper redistribution layer to place bond pads on the upper die, as recited in claim 7.

Applicants refer to the response filed on February 27, 2006, page 12. Among other things, Applicants contend that the Examiner failed to identify the redistribution layer in any one of Hung or Khandos.

Accordingly, Applicants respectfully request the Review Panel render a decision allowing the application.

Conclusion

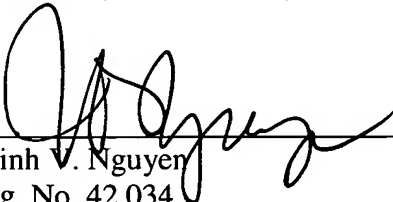
Applicant respectfully requests the Review Panel render a decision allowing the application.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: August 7, 2006

By



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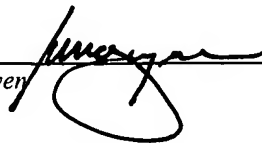
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Date: August 7, 2006



Tu Nguyen

August 7, 2006

Date